

Matthew E. Wright
Admitted pro hac vice
The Law Firm for Truck Safety, LLP
840 Crescent Centre Drive, Suite 310
Franklin, Tennessee 37067
(615)455-3588 Office
(615)468-4540 Fax
matt@truckaccidents.com
Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

KIMBERLY DEBEER, surviving spouse)	
and wrongful death personal)	
representative of)	
DANIEL DEBEER, deceased,)	
)	
Plaintiff,)	
)	
v.)	Civil Action #2:23-cv-33-ABJ
)	
AMAZON LOGISTICS, INC.,)	
d/b/a PRIME, AMAZON.COM, INC.,)	
AMAZON.COM SERVICES, LLC,)	
AAF555 LLC, NORTHWEST EXPRESS)	
LLC, ASD EXPRESS, LLC and)	
JUSTIN NZARAMBA,)	
)	
Defendants.)	

**PLAINTIFF'S NOTICE OF ISSUANCE OF
SUBPOENAS TO PRODUCE DOCUMENTS**

Plaintiff, Kimberly DeBeer, by and through her counsel of record, hereby gives notice of the issuance of subpoenas as follows: Pursuant to Federal Rule of Civil Procedure 45(a)(4), when a subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, notice and a copy of the subpoena must be served on each party before

being served on the person or entity to whom it is directed. This notice is to inform the Defendants that the attached subpoenas are being served upon the Records Custodians of:

1. Wyoming Highway Patrol, 5300 Bishop Blvd., Cheyenne, WY 82009;
2. Fleetnet America, Inc., 300 Commerce Drive, Cherryville, NC 28021;
3. Interstate Truck Centers, a/k/a I-State Truck Centers, 4801 Harbor Drive, Sioux City, IA 51111; and
4. All Pro Towing, LLC; 45402 Highway 92, Carson, IA 51525-4317.

Copies of the Subpoenas are attached hereto as Exhibits “1” through “4.”

THE LAW FIRM FOR TRUCK SAFETY, LLP

/ss/ Matthew E. Wright
Matthew E. Wright, TN #022596
Admitted Pro Hac Vice
840 Crescent Centre Drive, Suite 310
Franklin, Tennessee 37067
615-455-3588
615-468-4540 (fax)
matt@truckaccidents.com

Grant H. Lawson, #6-4260
Joseph P. Chenchar, #7-5576
METIER LAW FIRM, LLC
259 S. Center, Suite 301
Casper, WY 82601
Mailing: 4828 South College Avenue
Fort Collins, CO 80525
(307) 237-3800
(930) 225-1476 (fax)
grant@metierlaw.com
joe@metierlaw.com

George “Jed” Chronic
Admitted Pro Hac Vice
Maschka, Riedy, Ries & Frentz

151 Saint Andrews Court,
Building 1010
Mankato, MN 56001
(507)625-6600
(507)625-4002 (fax)
jchronic@mrr-law.com

*Attorneys for Plaintiff, Kimberly
DeBeer, surviving spouse of and
wrongful death representative of
Daniel DeBeer*

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2024, a true and correct copy of the foregoing was served via electronic mail to the following:

Zenith S. Ward
Buchhammer & Ward, PC
1821 Logan Avenue
P.O. Box 568
Cheyenne, WY 82003-0568
zsw@wyoming.com
Attorney for Defendant Northwest
Express, LLC and Justin Nzaramba

Grant H. Lawson
Joseph P. Chenchar
Metier Law Firm, LLC
259 S. Center, Suite 301
Casper, WY 82601
grant@metierlaw.com
joe@metierlaw.com

Stuart R. Day
WILLIAMS PORTER DAY & NEVILLE
159 North Wolcott, Suite 400
P.O. Box 10700
Casper, WY 82602
sday@wpdn.net
Attorney for Amazon Logistics, Inc., d/b/a
Prime; Amazon.com, Inc. and Amazon
Services, LLC

George “Jed” Chronic
Admitted Pro Hac Vice
Maschka, Riedy, Ries & Frentz
151 Saint Andrews Court,
Building 1010
Mankato, MN 56001
(507)625-6600 Office
(507)625-4002 Fax
jchronic@mrr-law.com

/ss/Matthew E. Wright
Matthew E. Wright